

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO

IN RE	*	BKRTCY. NO. 13-02622 MCF
MARIBEL SANCHEZ ORTIZ	*	CHAPTER 13
<u>DEBTOR</u>	*	

**DEBTOR'S MOTION AND NOTICE OF FILING OF POST-CONFIRMATION  
MODIFICATION OF CHAPTER 13 PLAN 11 USC §1329**

**TO THE HONORABLE COURT:**

**COMES NOW, MARIBEL SANCHEZ ORTIZ**, the debtor in the above captioned case, through the undersigned attorney, and very respectfully states and prays as follows:

1.The debtor is hereby submitting a post-confirmation modification of Chapter 13 Plan, 11 USC Section 1329, dated March 10, 2014, herewith and attached to this motion.

2.This Plan modification is filed to provide for the post-petition mortgage loan arrears to Banco Popular de Puerto Rico as stated in its motion for lift of stay, docket no. 25, and to provide for direct payments to said secured creditor commencing in March, 2014.

**NOTICE PURSUANT TO LOCAL BANKRUPTCY RULE 3015(f)**

**Within twenty-one (21) days after service as evidenced by the certification, and an additional three (3) days pursuant to Fed. R. Bank. P. 9006(f) if you were served by mail, any party against whom this paper has been served, or any other party to the action who objects to the relief sought herein, shall serve and file an objection or other appropriate response to this paper with the Clerk's office of the U.S. Bankruptcy Court for the District of Puerto Rico. If no objection or other response is filed within the time allowed herein, the paper will be deemed unopposed and may be granted unless: (i) the requested relief is forbidden by law; (ii) the requested relief is against public policy; or (iii) in the opinion of the Court, the interest of justice requires otherwise.**

I CERTIFY, that on this same date a copy of this Notice was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, and all CM/ECF participants; I also certify that a copy of this notice was sent via

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Post Confirmation Modification 11 USC 1329  
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regular mail to the debtor and to all creditors and interested parties appearing in the master address list, hereby attached.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 10<sup>th</sup> day of March, 2014.

/s/Roberto Figueroa Carrasquillo  
ROBERTO FIGUEROA CARRASQUILLO  
USDC #203614  
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United States Bankruptcy Court  
District of Puerto Rico

IN RE:

Case No. 3:13-bk-2622

SANCHEZ ORTIZ, MARIBEL

Chapter 13

Debtor(s)

AMENDED CHAPTER 13 PAYMENT PLAN

1. The future earnings of the Debtor(s) are submitted to the supervision and control of the Trustee and the Debtor(s) shall make payments to the Trustee ☒ directly ☐ by payroll deductions as hereinafter provided in the PAYMENT PLAN SCHEDULE.
2. The Trustee shall distribute the funds so received as hereinafter provided in the DISBURSEMENT SCHEDULE.

PLAN DATED: <u>3/10/2014</u> <input type="checkbox"/> AMENDED PLAN DATED: _____ <input type="checkbox"/> PRE <input checked="" type="checkbox"/> POST-CONFIRMATION Filed by: <input type="checkbox"/> Debtor <input type="checkbox"/> Trustee <input type="checkbox"/> Other	
<p align="center"><b>I. PAYMENT PLAN SCHEDULE</b></p> <p>                         \$ <u>370.00</u> x <u>12</u> = \$ <u>4,440.00</u>                          \$ <u>455.00</u> x <u>48</u> = \$ <u>21,840.00</u>                          \$ _____ x _____ = \$ _____                          \$ _____ x _____ = \$ _____                          \$ _____ x _____ = \$ _____                            TOTAL: \$ <u>26,280.00</u> </p> <p>Additional Payments:                          \$ _____ to be paid as a LUMP SUM                          within _____ with proceeds to come from:</p> <p><input type="checkbox"/> Sale of Property identified as follows:                          _____                          _____</p> <p><input type="checkbox"/> Other:                          _____                          _____</p> <p>Periodic Payments to be made other than, and in                          addition to the above:                          \$ _____ x _____ = \$ _____</p> <p>PROPOSED BASE: \$ <u>26,280.00</u></p> <p align="center"><b>III. ATTORNEY'S FEES</b>                          (Treated as § 507 Priorities)</p> <p>Outstanding balance as per Rule 2016(b) Fee                          Disclosure Statement: \$ <u>2,861.00</u></p> <p>Signed: <u></u>                          Debtor</p> <p>_____                          Joint Debtor</p>	<p align="center"><b>II. DISBURSEMENT SCHEDULE</b></p> <p>A. ADEQUATE PROTECTION PAYMENTS OR _____ \$ _____</p> <p>B. SECURED CLAIMS:  <input type="checkbox"/> Debtor represents no secured claims.  <input checked="" type="checkbox"/> Creditors having secured claims will retain their liens and shall be paid as follows:</p> <ol style="list-style-type: none"> <li>1. <input checked="" type="checkbox"/> Trustee pays secured ARREARS:                          Cr. <u>BANCO POPULAR D</u> Cr. <u>Banco Popular De Pl</u> Cr. _____                          # <u>71010011196212</u> # <u>Post-Pet Arrears</u> # _____                          \$ <u>6,737.00</u> \$ <u>2,212.76</u> \$ _____</li> <li>2. <input checked="" type="checkbox"/> Trustee pays IN FULL Secured Claims:                          Cr. <u>RELIABLE FINANCI</u> Cr. _____ Cr. _____                          # <u>44656599000</u> # _____ # _____                          \$ <u>9,177.10</u> \$ _____ \$ _____</li> <li>3. <input type="checkbox"/> Trustee pays VALUE OF COLLATERAL:                          Cr. _____ Cr. _____ Cr. _____                          # _____ # _____ # _____                          \$ _____ \$ _____ \$ _____</li> <li>4. <input type="checkbox"/> Debtor SURRENDERS COLLATERAL to Lien Holder:</li> <li>5. <input type="checkbox"/> Other:</li> <li>6. <input checked="" type="checkbox"/> Debtor otherwise maintains regular payments directly to:  <u>BANCO POPULAR D</u> <u>Banco Popular De Pl</u></li> </ol> <p>C. PRIORITIES: The Trustee shall pay priorities in accordance with the law.                          11 U.S.C. § 507 and § 1322(a)(2)</p> <p>D. UNSECURED CLAIMS: Plan <input type="checkbox"/> Classifies <input checked="" type="checkbox"/> Does not Classify Claims.</p> <ol style="list-style-type: none"> <li>1. (a) Class A: <input type="checkbox"/> Co-debtor Claims / <input type="checkbox"/> Other: _____  <input type="checkbox"/> Paid 100% / <input type="checkbox"/> Other: _____                          Cr. _____ Cr. _____ Cr. _____                          # _____ # _____ # _____                          \$ _____ \$ _____ \$ _____</li> <li>2. Unsecured Claims otherwise receive PRO-RATA disbursements.</li> </ol> <p>OTHER PROVISIONS: (Executory contracts; payment of interest to unsecureds, etc.)                          Debtor(s) to provide ADEQUATE PROTECTION PAYMENTS to Reliable thru the Trustee in the sum \$100.00 per month for the next eight months or until confirmation. Debtor(s) to provide auto insurance upon maturity to Reliable thru Eastern America Insurance Company.                          * "Tax refunds will be devoted each year, as periodic payments, to the plan's funding until plan completion. The plan shall be deemed modified by such amount, without the need of further Court order. The debtor(s) shall seek court's authorization prior any use of funds."                          Late filed claims filed by creditors will receive no distribution.                          "Surrenders collateral": Shares/savings in any Cooperativa/Association/Bank.                          Debtor reserves the right to object claims after plan confirmation.</p>

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